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April 23, 2025

**Via ECF**Hon. Philip M. Halpern, U.S.D.J.  
The Hon. Charles L. Brieant Jr. Federal Building and Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150Re: *Wolf, et al. v. Dolgen New York, LLC*  
Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”), and Defendant Dolgen New York, LLC (“Dollar General”, the parties collectively, the “Parties”), through their undersigned counsel, submit this joint letter motion to request the Court stay the case for ninety (90) days. In support of this motion, the Parties advise the Court that they have reached a settlement in principle with respect to the Wolfs’ claims against Dollar General. The Parties are working cooperatively on a final settlement agreement and will be seeking preliminary approval of a nationwide class in the case of *Braun v. Dolgencorp* that is pending in the Superior Court of New Jersey for Middlesex County.

Through this letter motion, the Parties respectfully request the Court stay the matter for ninety (90) days to permit sufficient time for the Superior Court to decide the motion for preliminary approval. If the Court grants preliminary approval, the Parties will ask for a further stay to allow sufficient time for final approval. The Parties propose submitting a further status update to the Court on or before July 21, 2025 advising the Court of the status of the settlement approval.

Respectfully submitted,

**THE DANN LAW FIRM, PC****MCGUIREWOODS LLP**/s/ Javier L. Merino  
Javier L. Merino, Esq.  
Counsel for Plaintiffs and the Putative Class/s/ Philip A. Goldstein  
Philip A. Goldstein, Esq.  
Counsel for Defendant Dolgen New York, LLC